

1894-019 Chancery Causes: Butt Young & Co] vs. W. C. Herndon & Co.
Lee Co.

Butt, Young, Cox, Parsons, Woodward, Stapleton, Pennington

CA-Debt

T-Property

-Deed

Marianne Kirk

To the Hon. H. S. K. Morrison, Judge of
the Circuit Court for Lee County:

Humbly Complaining, Your ora-
tors J. R. Butt, J. P. Young & W. V. Cox
merchants and partners in trade under
the firm name of Butt, Young & Company,
respectfully represents unto your Hon-
or that at the special instance and
request of W. C. Herndon, who was then
doing a mercantile business in Lee County,
Virginia, on October, 30th, 1893 in the city
of Knoxville they sold and delivered to him
the said Herndon a quantity of goods, to
wit, hats amounting in the whole to the
sum of \$115⁰⁰; that an itemized stati-
ment of said goods is here filed marked
"Invoice" as a part of this bill; that said
Herndon undertook to pay for said goods
four months after the day of purchase,
to wit, on the 1st day of March, 1894; that
said sum of money is still owing to
your orators and will become due on
March 1st 1894; that said goods were
shipped to said Herndon at Punning-
ton Gap, Va as was directed by him;
that he before taking said goods out of
the Depot turned the same together
with a large quantity of other goods which
he had purchased about the same ^{time} from
other wholesale merchants over to his
father Simeon Herndon, & brother John
P. Herndon; that he also let his said

father & brother have a quantity of goods &c which were then in his store house and some forty head of valuable cattle; That these parties are now in the possession of said goods and cattle selling and disposing of the same; That the transfer of said goods and Chastles and cattle to said Sarker and John P. Herndon was without a valuable consideration, or at least a consideration equal in value to said goods, cattle &c., and was therefore fraudulent as to your orators.

Your orators will further show unto your honor that at the time they sold & delivered said goods to said Herndon he was in the possession of, and the records of the County Clerk's office showed him to be the owner in fee of a large quantity of land lying and being in Lin County, in the Pocket and Crab Orchard County, to wit: lands conveyed him by Sarker Herndon & John B. Pennington, the heirs of Charles Pennington decd., Tobias Hughes & wife and John A. Stapleton & wife; That Copies of said Conveyances are here filed marked A, B, C and prayed to be taken as a part of this bill; That after said Herndon had become indebted to your orators as aforesaid, to their great surprise one David P. Parsons had recorded

in the County Court Clerk's office of San
County on Nov. 10th 1893, a deed signed
by said H. C. Herndon and wife and dated
March, 14th 1893, whereby he conveyed
all of his said ^{land} to said Parsons, except
the Stapleton tract and that contained in
John B. Punnington & Larkin Herndon's deed
dated July 30th 1889; that they are ad-
vised that said deed is without a con-
sideration, although it cites a con-
sideration of \$5000.00 in hand paid,
which is not true; that whether it had
an actual and valuable consideration
as to your orators is of little concern,
because at the time said Herndon be-
came indebted to them they had no no-
tice of any kind whatever of the exist-
ence of said Parsons deed or that he
claimed any interest of any kind
whatever in the land it purports to con-
vey. A copy of said Parsons deed is here
filed marked and prayed to be
considered herewith.

Your orators will again show
unto your honor that on Nov. 10th 1893
said H. C. Herndon executed a deed
of him upon the land mentioned in
said deed of John B. Punnington and Larkin
Herndon dated July 30th 1893 to secure
a pretended debt to one Wm. Woodward
for \$675.00; that this deed on Nov. 10th 1893
was acknowledged and put on record

in Lin County Clerk's office, that they are advised and informed that this lien is voluntary & without consideration. A copy of this lien is here filed marked and prayed to be taken as a part of this bill.

Your orator will further show in to your honor that about the time said transfer of said goods, & cattle was made, and about the time said deed to Parsons was put on record and said lien made perhaps the same day, said Herndon absconded this State and is now a non-resident thereof; that the lien retained by said Stapleton on the tract of land conveyed by him has long ago been fully paid; that there are no other liens or incumbrances upon said land than the one herein mentioned and that the rents and profits of said land would be insufficient to pay said claim and the costs of this suit in five years.

The premises considered your orator is advised that said deed of March 14th 1893 to said Parsons, said Lien to said Woodward and said transfer of said goods and cattle, as to your orator and all other creditors alike situated are void, and that the property covered thereby is assets out of which your orator's claim will be paid; and that they have rights herein, of which a court of equity will take cognizance.

The prayer therefore of your prae-
tors is that H. C. Herndon, John P.
Herndon, Sarker Herndon, Wm. Woodward
John C. Stapleton and David P. Parsons be
made parties defendants to this bill of
Complaint; that they each be required
to answer its several allegations on oath;
that by virtue of the affidavit herein
filed marked "Affidavit" made pur-
suant to section 2964 of Code 1887 an attach-
ment issue herein and be levied upon
said Herndon's estate and the same be held
until a future order of this Court; that
said John P. & Sarker Herndon especially
answer on oath how and in what they paid
said H. C. Herndon for said goods, Cattle &c.,
when, where and of whom they got the money
or other thing which they lent said Herndon
to use for said goods, Cattle &c.; if they claim
said H. C. Herndon was indebted to them, they
will further answer the amount thereof,
for what was such indebtedness, when
where and of whom they got the money
or other thing which they lent said H. C. Herndon
to use whereby he became indebted to them;
the date of each item of indebtedness,
the number, kind and value of said
Cattle, an itemized statement or an
invoice of all goods and chattels of every kind
and the price they gave therefor, which was
turned over to them or either of them by said
H. C. Herndon; that David P. Parsons specially

answer the true amount if any thing, he has
paid on the bond mentioned in said deed of
Mch 14th 1898; where, where, & from whom he obtained
the money or other thing he paid said Sheridon
on said bond how much if any thing
he still owes thereon; That said William Wood-
ward will specially answer an oath where and
for what said H.C. Sheridon became indebted
to him, the true amount thereof, and where
it became or will become due & payable, and
from whom he obtained the money or other
thing whereby said Sheridon became indebted
to him; That on a final hearing of this case
a judgment be given your orator for
said sum of money; That said deed be
transfer of goods & cattle be annulled and set-
aside and that enough of said property be sold
to pay your orator's said claim and the
costs of this suit &c. And that all further and
general relief be granted your orator as
the nature of his case may require. And
your orator will ever pray &c.

Pennington Bros

J. G.

1st Jan'y 1894

Butt Young & Co

vs Billie Chan

H. C. Thurman et al

1894, 1st Jan'y Rules Bill filed, 5 pa. Exp on home debts
order Pub for nonresident & 1st for home debts
" 2nd Jan'y Rules 5 & 1st for home debts confd
" 1st Feb'y " Contd for ord Pub
" 2nd " " Ord Pub completed & set for hearing
by Ref
" June Term Decree & contd

C 8.94
S 2.50
Coc 5.75-
Pr 5.00
atly 15.00

\$37.19

Prmo 2.50

\$39.69

Defts Costs
\$1.60

J.R. BUTT,
WILL H. COX,
J.P. YOUNG.

BUTT, YOUNG & CO.

BUTT, COX & YOUNG.

WHOLESALE DEALERS IN

HATS, CAPS, AND STRAW GOODS.

LADIES TRIMMED HATS A SPECIALTY.

36
COMMERCE
STREET.

Knorrville, Tenn. Oct 30, 1893

Sold to W. O. Harmond,

TERMS 4 months

Cash Discounts, 5 per cent off 10 days. 5 per cent off 30 days.

Cynthiana, Va.

748	1	Doz Mens Elk Fur	900	900
2	1	" " " "	1200	1200
3	1	" " " "	1200	1200
192	1/2	" " Nut "	1200	600
213	1/2	" " " "	1200	600
37	1/2	" " " "	1200	600
53	1/2	" " Bro Crush	600	300
58	1/2	" " Wine Hoal	900	450
119	1	" Days Blue Bro	450	450
114	1	" " Bro "	400	400
275	1	" Mens Caps	1200	1200
325	1/2	" " " "	600	300
475	1/2	" " Elk Hoal	800	400
1687	1/4	" Ladies Hats	900	225
253	1/4	" " " "	900	225
1663	1/4	" " " "	600	150
144	1/4	" " " "	1200	300
111	1/4	" " " "	600	150
141	1/4	" " " "	1200	300
226	1/4	" " " "	1200	300
292	1/4	" " " "	2400	600
546	1/4	" " " "	2400	600

C. & C.

50

\$11500

Notary Fee

50

Butt Young & Co

11550

COX COUNTY, to wit:

I, Isaac Bogardus a Notary Public in and for said County and State, do certify that W. O. Harmond this day made oath before me that the foregoing account, amounting to \$ 11550 is to the best of his knowledge and belief justly due and that he claims interest on the same from the 30th day of January 1894

STATE OF TENNESSEE, }
KNOX COUNTY, } to wit:

I, Isabau Bogardus a Notary Public in and for said County and
State, do certify that Willie H. Cox this day made oath before me
that the foregoing account, amounting to \$ 115⁵⁰ is to the best of his knowledge
and belief justly due and that he claims interest on the same from the 30th
day of January 1894
Given under my hand this 24th day of November 1893

Isabau Bogardus

Bull ~~Co~~ Yang T Co

V.S.

W.C. Hudson

11/3/50

W.C. Hudson
Bull Yang T Co

To the Honorable H.S.K. Morrison, Judge of the Circuit Court of Lee County Virginia:

The demurrer and answer of Larkin Herndon to a bill in chancery exhibited against him and others in this honorable court by J.R. Butt, J. P. Young and W.H. Cox, partners trading under the firm name of Butt Young & Co.

Respondent says that complainant's bill is not sufficient in law to call upon him to answer it in this honorable court, but that there is good cause of demurrer thereto, and he demurs accordingly and prays judgement of his said demurrer &c. And not waiving said demurrer, but relying and insisting thereon, should other and further answer be required of him, answering he says:

That he has already filed his separate answer to a bill in chancery against him and others in this honorable court by Powers Little & Co., he has also filed his answer to a bill in chancery exhibited against him and others in this court by Cowan McClune & Co., and he has also filed his answer to another bill in chancery exhibited against him and others in this honorable court by Berry Gilliam & Co. all of which causes are still pending in this honorable court, and all have a common purpose with the bill filed by complainants, and contain almost identically the same allegations except as to the amount claimed, and are against identically the same persons. Respondent refers to said answers and adopts them as a part of his answer in this case, and asks that they may be treated as such. And now having answered said bill as fully as he is advised it is material he should answer, he prays to be hence dismissed with his costs &c.

Duncan H. Hyatt, Jr.

*Filed before me this 13th day of March 1874
by Larkin Herndon*

A.B. Murreey clerk

ab

W.C. Herndon et als.

Ads. { Separate Demurrer and
 { Answer of Larkin Herndon, one of the defendants.

Butt Young & Co.

Duncan & Hvatt, p.d.

*Filed in open court March 9th
1894 A.B. Munsey Clerk*

To the Honorable H.S.K. Morrison, Judge of the Circuit Court of Lee County, Virginia:

The separate answer and demurrer of John P. Herndon to a bill in chancery exhibited against him and others in this honorable court by J. R. Butt, J. P. Young and W. H. Cox, partners trading under the firm name of Butt Young & Co.

Respondent says that complainant's bill is not sufficient in law to call upon him to answer it in this honorable court, but that there is good cause of demurrer thereto, and he demurs accordingly, and prays judgement of his said demurrer &c. And not waiving said demurrer, but relvins and insisting thereon, should other and further answer be required of him answering, he says:

That he has filed his answer to a bill in chancery exhibited against him and others in this court by Powers Little & Co., he has also filed his answer to a bill in chancery exhibited against him ~~in~~ and ~~and~~ others in this honorable court by Cowan McClung & Co., and he has also filed his answer to a bill in chancery exhibited against him and others in this honorable court by Berry Gilliam & Co., all of which causes are still pending in this honorable court, and all have a common purpose with the bill filed by complainants, and contain almost identically the same allegations except as to the amount claimed, and all are against identically the same parties. Respondent refers to said answers and adopts them as a part of his answer in this case, and asks that they may be treated as such. And now having answered said bill as fully as he is advised it is material he should answer, he prays to be hence dismissed with his costs &c.

Sworn to before me this the 5th of March 1874
by John P. Herndon

Duncan Wyatt P. d.
A. B. Munsey, Clerk

86
W.C. Herndon et als.

Ads. { Separate answer and
 { Demurrer of John P.
 { Herndon, one of the
 { Defendants.

Butt, Young & Co.

Duncan & Hyatt, D.C.

*Filed in open court March
the 9th 1864
A.B. Munsey Clerk*

Butt, Young & Co.

vs.

In Chancery.

The depositions of

J. P. Young

taken before me, C. B. Tompkins a

notary public in and for the county of Knox, and State of Tennessee, pursuant to notice hereto annexed, at the office of Henry. Fenton, ~~212 7/8~~ Gay street, in the city of Knoxville, in the said county and state on the 2nd day of February, 1894, between the hours of 7 A. M. and 8 P. M. of that day, to be read as evidence in behalf of Butt, Young & Co. in a certain suit in equity depending in the Circuit Court of Lee county, Virginia, wherein Wm. C. Herndon, John. P. Herndon, Larken. Herndon, Wm. Woodward and David. P. Parsons are defendants, and said Butt, Young & Co. is plaintiff.

Present.

for defts'

for plaintiff

The witness *J. P. Young* after being duly sworn deposes as follows to wit:

Ques.

Please give your name, age, residence and occupation?

Ans.

J. P. Young Knoxville Tenn
lately a partner of the above
firm age (30) thirty years

Ques.

State whether or not the deft. *W. C. Herndon* is indebted to said plaintiffs in any sum of money, if so for what, and when it did or will become due.

Ans.

He is indebted to plaintiffs in the sum of one hundred & fifteen dollars for goods purchased on Oct 3rd 1893 as per itemized statement here with filed marked Invoice

And said goods were sold
on four months time and
with therefore become

Ques. 13

due March 12/94

State how it happened ~~xxx~~
the plaintiffs sold and delivered
said goods on a credit.

Ans.

We understood that he the
said McKernan had made
statement to Jowers settled on
as to his assets which they
read to us and which showed
he owned a large body of
land in Lee Co Va and
we believed he was the
owner thereof on the
day said goods were sold
and delivered to firm

Ques. 14

State whether
said sale was made or not at the time
of, or at any time prior thereto you
had any notice of deed dated March
14th 1893 wherein said McKernan conveyed
a large part of his real estate
to one David A. Parsons.

Ans.

We did not have any notice
or information of the existence
of such deed until after
Nov 10/93. Had we known at the
time said sale of said goods

was made of the existence
of said deed we would
not have sold him
said goods

And further this deponent
~~deposes~~ not
J. P. Young

Tennessee.

County of Knox. to wit

I C. B. Tompkins a notary public for the county of
Knox in the said state do hereby certify that the fore-going
depositions of J. P. Young

were duly taken, sworn to, and subscribed before me at the time
and places and for the purpose therein mentioned.

Given under my hand and seal this 2nd day of February 1904

C. B. Tompkins
Notary Public

Butt Young & Co

Depositions

W. C. Herndon et al

Received by mail in good
condition February the 4th
and filed on Feb'y the 5th 1874

A. B. Munsey Clerk

CLERK UNDER MY HAND AND SEAL THIS

5th of February 1874

and placed on file for the purpose therein mentioned.

W. C. Herndon, above to, and apprehended before me at the time

deposition of

taken in the said case as hereby certified that the fore-going

I O. R. Robinson a notary public for the county of

County of Essex to wit

Township.

J. R. BUTT,
WILL H. COX,
J. P. YOUNG.

BUTT, YOUNG & CO.

WHOLESALE DEALERS IN
HATS, CAPS, AND STRAW GOODS.
LADIES TRIMMED HATS A SPECIALTY.

36
COMMERCE
STREET.

(Invoice)

Knoxville, Tenn. Oct 30, 1893,

Sold to W. C. Herndon,

Cynthia, Va.

TERMS

Cash Discounts, 5 per cent off 10 days. 5 per cent off 30 days.

748	1	Doz Mens Fur Blk	900	900
2	1	" " " "	1200	1200
3	1	" " " "	1200	1200
192	1/2	" " " Nut	1200	600
213	1/2	" " " "	1200	600
37	1/2	" " " "	1200	600
53	1/2	" " Crush Bro.	600	300
58	1/2	" " Wool Trim	900	450
119	1	" Boys " Blue Bro	450	450
114	1	" " " Bro.	400	400
270	1	" Mens Caps	1200	1200
325	1/2	" " " "	600	300
475	1/2	" " Wool Blk	800	400
168	1/4	" Ladies Hats	200	225
253	1/4	" " " "	900	225
166	3/4	" " " "	200	150
144	1/4	" " " "	1200	300
111	1/4	" " " "	600	150
141	1/4	" " " "	1200	300
226	1/4	" " " "	1200	300
207	1/4	" " " "	2400	600
226	1/4	" " " "	2400	600

C. & C.

50,

\$115 00

Burt Young & Co
AGAINST

W. C. Herndon et al

To W. C. Herndon. Larkin Herndon. John P. Herndon Wm Woodward

David P. Parsors and John C. Stapleton

Take notice that on the 2nd day

of February 1894

at the office of

County, State of

the City of Richmond, Virginia

I will proceed to take the deposition of

to be read as evidence on behalf of

Burt, J. P. Young and
St. H. Herndon about business under the firm
named of Burt, Young & Co

in a certain suit in Equity now pending in the Circuit Court of Lee

County, State of Virginia wherein said

Plaintiff and you and each of you are Defendants And if from any

cause the taking of said deposition

not begun on that day, or being begun not complete, the same will be continued from day to day or from time to time and if desired from place to place, until the same are complete. You may attend and cross-examine if you wish.

June 25th

1894

Very Respectfully,

Burt Young & Co
per Princeton Bros
Attorneys

H. C. Hudson

Burt Young & Co

AGAINST

W. C. Herndon et al

To W. C. Herndon. Larkin Herndon. John P. Herndon Wm Woodward
David R. Parsons and John C. Stapleton

Take notice that on the 2nd day

of February 1894 at the office of Harry G. Benton at
253 Say Street in the City of Harrison, Knox
County, State of Tennessee I will proceed to take the deposition of Burt Young
and others

to be read as evidence on behalf of Burt, J. P. Young
and J. H. Coe partners doing business
under the firm name of B. Young & Co
in a certain suit in Equity now pending in the Circuit Court of Lee
County, State of Virginia wherein said Burt Young & Co
Plaintiff and you and each of you are Defendants And if from any
cause the taking of said depositions are not begun on that day, or being begun not complete, the same will be
continued from day to day or from time to time and if desired from place to place, until the same are complete. You
may attend and cross-examine if you wish.

January 4 1894

Very Respectfully,

Burt Young & Co
per Prumington Bros

Quill, Young & Co
vs } Notice to Take
depositions

Wm C. Herndon et al

Executed on Jan. 12th 1894
by delivering a copy of
this writ with notice to
each of the following
named persons to wit:
John C. Herndon, Earlton
Herndon, David C. Par-
sons, Wm Woodward & John
C. Stapleton.

W M Pennington

Virginia Lee County, Va.

The foregoing return
signed by Wm M. Pennington
was this day sworn to by
him before me in my
County aforesaid.

Witness my hand
this Jan 13th 1894

E. H. Pennington
Notary Public

Burt Young & Co

J. S. Affidavit

M. Verdou (4)

Filed Dec 7th 1894

A. B. Munsey Clerk

Don't Pack - 2011, Page 400.

all the time - conveyed . . . the following . . .
 . . . the year . . . the . . .

12.11.2013 10:00 (10:00)

1911-12-10 (1891)

$$(\text{H}^1(\mathbb{R}^n, \mathbb{R}))^{\otimes k} \cong \mathbb{R}^{\binom{n+k-1}{k}} \quad \text{for } k \geq 1, \quad (\text{H}^1(\mathbb{R}^n, \mathbb{R}))^{\otimes 0} \cong \mathbb{R}.$$

Deed Book no 28, page 433.

This deed made the 10th day of Novr 1893 by and between W.C. Herndon of the first part and William Woodward of the second part of the county of Lee and State of Virginia The part, of the first

part doth ~~grant~~ unto the party of the second part a tract or parcel of land ~~XXXX~~ bounded as follows, Beginning at a point at the mouth of Reeds Creek running with Lawsons line to the top of Stone Mountain thence with the meanderings thereof to the McCracks line and with some of the ~~XXXX~~ north fork of Powells River and with meanderings of said waters to the beginning. This deed of trust is to secure and hold good to the party of the first part for the sum of six hundred and seventy five dollars which the party of the second part holds against the party of the first part and contract shall remain and hold good to the party of the second part until these notes is satisfied in full. Witness the following signature and seal

W.C. Herndon (seal)

Virginia Lee County, to wit:-

I, J. F. Pargin a justice of said county in and for the same do hereby certify that W.C. Herndon whose name is signed to the foregoing deed bearing date on the 10th day of Novr 1893 and who personally appeared before me in my county aforesaid and acknowledged the same to be his act and deed. Given under my hand and seal this the 10th day of Nov 1893

J. F. Pargin J.P.

Virginia Lee County to wit:-

This day A. I. Pennington personally appeared before me, E. W. Pennington, notary public in and for the county and state aforesaid and made oath that he had copied the foregoing deed from the records of the county court of Lee County, on file in the clerk's office of the said county court and that the same is a true transcript therefrom. This Feb _____ 1894.

Deed Book ~~Book~~ No. 20 .page 106 .

THIS DEED of conveyance made the 01st day of February/ 1890
by and between Tobias Hughs and Martha Hughs and Peggie
Parsons of the first part ~~all~~ all of the county of Lee and
state of Virginia and William C. Herndon of the ~~county~~ ^{the second part} and
state aforesaid . Witnesseth that for and in consideration of
the sum of Eight Hundred dollars in hand paid the receipt of
~~which~~ is hereby acknowledged the parties of the first part
do do bargain sell and convey unto the parties of the second
part a ~~certain~~ certain parcel or tract of land lying and being in the
county of Lee and state of Virginia situated on Needs Creek
waters of the North Fork of Powells River being two hundred
acres be the same more or less and bounded as follows to wit
being the land where ^{Sit} Tobias Hughs now lives and adjoining the ~~the~~
land of Samuel Parsons James Quillen and Nathan Zion and the
parties of the second part to have and to hold forever . And the
parties of the first part warrant specially the land here-
by conveyed . Witness the following, signatures and seal this day
and date above written .

Tobias Hughs , (seal)

Martha Hughs (seal)

Margaret R. Parsons (seal)

~~State~~ Virginia Lee County to wit :

I, W. C. Parsons Justice of the peace for the aforesaid ~~of~~
county and state do certify that Tobias Hughs and Martha
Hughs his wife and Peggie Parsons whose names are signed to the
foregoing deed ^{partially} / date — on the 01st day of February, 1890 ,
acknowledged the same before me in my ~~county~~ county and state
aforesaid to be their act and deed and does not wish to ~~cancel~~

replaced it . Given under my hand and seal this the 6th day of
February 1890

F.M. Parsons J.P.

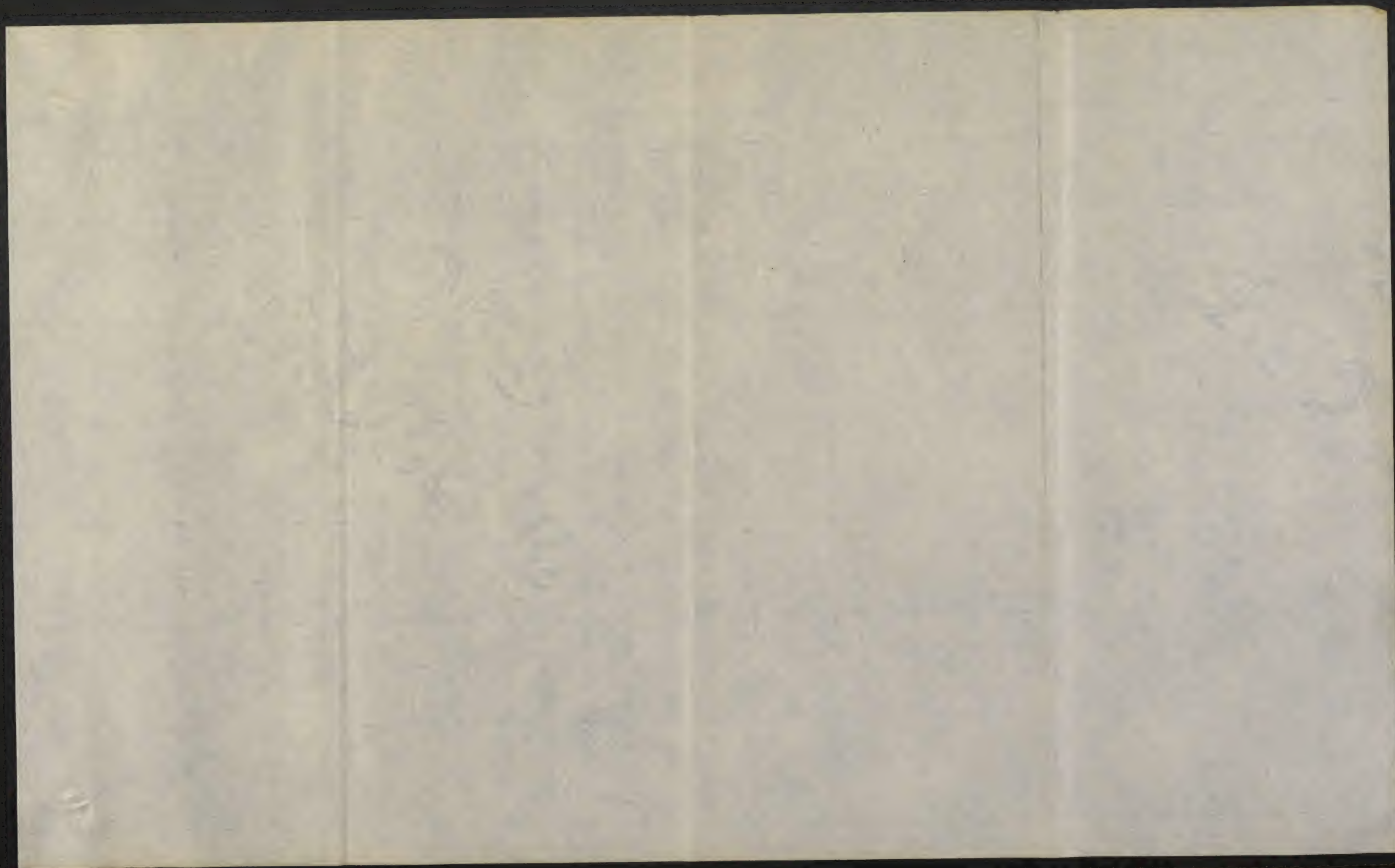
Virginia Lee County to wit : In the office of the clerk of the
said county, May the 6th 1890 this deed was presented and
with the certificate thereto annexed admitted to record

I do John H. Gibson Clerk.

Virginia Lee County to wit :

This day R.L. Pennington personally appeared be-
fore me E.W. Pennington, a notary public in and for the said /y/
county and state of Texas in and made oath that he had copied
the foregoing deed from the records of said county court of
the county on file in the ~~proper~~ clerk's office of the said
county court and that the same is a true and correct copy from the /a/
said records . Given under my hand this the ____ day of Feb.
1890.

_____.P.



Deed Book No. 20 page 104

This deed of conveyance made this 10th day of March 1890 by and between John C. Pennington and Fannie Pennington his wife and Martha J. Robins and Mary A. Robins of the county of Lee and state of Virginia and Green A. Pennington and Susan his wife of the county of Perry and state of Kentucky of the first part and and William C. Herndon of the second part of the county of Lee and state of Virginia witnesses each that for and in consideration of the sum of \$500.00 dollar in hand paid the receipt of which is hereby acknowledged the parties of the first part do hereby grant, sell, and sell and convey unto the parties of the second part all of their right and title in the Charles Pennington tract of land lying and being in the county of Lee and state of Virginia on the waters of Jones Creek and bounded as follows to-wit: Beginning at a bench and a white oak on the west bank of a creek whence southerly to a poplar whence to a white oak on the top of a ridge whence northerly to a white oak on a ridge whence northerly to a cedar tree and then said road south northerly to a bench ^{near} the mouth of the first hollow near the head of Jones Creek and then said creek in the mouth of said creek to Joseph Brown corner whence northerly with said Josephs line to the Charles Pennington and with said line to the beginning. The parties of the first part do hereby generally the said hereby convey the parties of the second part to have and to hold forever. Witness my following hand and seal this 10th day of March 1890

John C. Pennington (and)

THE UNITED STATES OF AMERICA
DO hereby certify that the within and foregoing is a true and correct copy of the original as the same appears in the records of the Department of the Interior.

Wm. Patterson, Secy.

WITNESSED my hand and the seal of the Department of the Interior at Washington, D.C., this 1st day of May, 1891.

May 6 1891

In testimony whereof, I have hereunto set my hand and the seal of the Department of the Interior at Washington, D.C., this 1st day of May, 1891.

Wm. Patterson, Secretary of the Interior.

For the purpose of recording the within and foregoing, I have hereunto set my hand and the seal of the Department of the Interior at Washington, D.C., this 1st day of May, 1891.

Wm. Patterson, Secretary of the Interior.

For the purpose of recording the within and foregoing, I have hereunto set my hand and the seal of the Department of the Interior at Washington, D.C., this 1st day of May, 1891.

Wm. Patterson, Secretary of the Interior.

For the purpose of recording the within and foregoing, I have hereunto set my hand and the seal of the Department of the Interior at Washington, D.C., this 1st day of May, 1891.

Wm. Patterson, Secretary of the Interior.

For the purpose of recording the within and foregoing, I have hereunto set my hand and the seal of the Department of the Interior at Washington, D.C., this 1st day of May, 1891.

Wm. Patterson, Secretary of the Interior.

For the purpose of recording the within and foregoing, I have hereunto set my hand and the seal of the Department of the Interior at Washington, D.C., this 1st day of May, 1891.

H. C. Herndon

Transcript of
John P. Herndon
Copy for H. C. Herndon

Deed Book No 22 page 112.

This deed made this November the 9th 1869 by and between M. C. Parsons of the first part and Craig Arndon of the Second part both of the county of Lee and State of Virginia. Witnesseth that the part of the first part doth grant bargain sell and convey unto the party of the ~~first~~ ^{second} part his undivided interest in Charles Pennington now deceased estate that he bought of Anderson Robens and wife heirs of a forsaide Charles Pennington Deed for the sum of one hundred dollars in hand paid on receipt of which is hereby acknowledged, the aforesaid M. C. Parsons binds himself to warrant the land hereby conveyed with all its appurtenances forever. Witness my hand and seal day and ~~year~~ first written.

M. C. Parsons (seal)

Virginia Lee County to wit

I, V. R. Kelly Notary Public for the aforesaid county do certify that M. C. Parsons whose name is signed to the above deed bearing date ~~xx/xx/xx~~ Oct. 9th 1869, personally appeared before me in my county aforesaid and acknowledged his signature to this deed to be correct for the purpose mentioned in the above deed. Given under my hand this Nov. 9th 1869.

V. R. Kelly N.P.

Virginia Lee County to wit: ---In the ~~County of Lee~~ of the said county May the 6th 1880, this deed was presented and with the certificates hereto annexed admitted to record.

Test John Gibson, Clerk.

Virginia Lee County to wit: This day A. Pennington personally appeared before me a Notary Public for the aforesaid county, in my county aforesaid and made oath that he had copied the foregoing, as a true and correct copy of the said county's records and that the same is a true transcript thereof from the said records. This Feb ___ 1881

N.P.

H. C. Hudson

Franz copy of deed

M. C. Farnum

~~~~~

Fee for copy \$0.25



Deed Book No 20 .page 163.

This Deed made thos the 30th day of July 1868 between John R. Pennington of/ and Larkin Herndon of the first part and William C. Herndon of the <sup>second</sup> ~~second~~ part . J.R. Pennington now a resident of Hawkins County Tennessee and the other named parties of Lee county Virginia . Witnesseth that in consideration of the sum of \$50.00 fifty dollars in hand paid the receipt of ~~which~~ is hereby acknowledged the said John R. Pennington and Larkin Herndon do ~~grant~~ bargain and sell unto the said William C/ Herndon a certain tract or parcel of land lying and being in the county of Lee and State of Virginia it being <sup>the same</sup> a part of ~~the~~ a tract of land assigned to John Pennington Sr by commissioners it being a part of the Mc Gradio Survey bounded as follows to wit : Beginning ~~at~~ the mouth of Jones Creek crossing the North Fork of Powers River southerly up the North Side of Stone Mountain with Partition line to the top of said mountain thence eastwardly with the top of same with the varying meanders thereof to the original Mc Gradio line and with line thereof northwardly to the ~~top~~ North Fork of Powers River thence Westwardly with the <sup>meander</sup> varied meanderings thereof to the beginning . And the aforesaid John R. Pennington ~~and~~ and Larkin Herndon do covenant and agree with the said William C. Herndon to warrant generally the land hereby conveyed with all its appurtenances . Witness the following signatures and seals The number of acres now known but by boundary be the same more or less .

X John R. Pennington ( seal )

Larkin Herndon ( seal )

Virginia Lee County to wit :

I, John G. Hyatt clerk for the circuit for Lee county, state of Virginia do hereby certify that John R. Pennington and Larkin Herndon when named as signed to the foregoing as J. Pennington



Hearing held on the 30th day of July, 1890 each personally  
appeared before me and acknowledged the same to be their act  
and deed for the purpose therein stated. Given under my hand  
this Sept 7th 1890.

J. A. E. H. 200 clerk.

Virginia 1st County to wit: In the office of the clerk of  
~~the~~ said county, this deed was presented and with the  
certificate thereto annexed admitted to record.

Test John L. H. 200 clerk.

Virginia 1st County to wit: This day R. L. Foran, Notary Public  
personally appeared before me a Notary Public in and for the county  
and state aforesaid and said day that he had copied the for-  
going deed from the records of the county court of said county  
on file in the clerk's office of the said county court, and  
that the same is a true transcript from the said records. This  
10th day of \_\_\_\_\_ 1890.

U.P.



H. C. Hudson

From { Copy of Deed  
John B. Pennington  
~~~~~

For far Copy

\$0.50

Deed Book NO 23, page 110.

This ~~add~~/deed made this the 7th day of March 1887 between John C. Stapleton and Almeida his wife of the first part and W. Craig Herndon of the second part all of the county of Lee and state of Virginia. Witnesseth that in consideration of the sum of two hundred dollars a hand paid and secured to be paid by the party of the second part, ^{to the party of the first part} the receipt of which is hereby acknowledged, the said party of the first part by these presents give, grant, sell, deliver and convey unto the party of the second part a certain tract or parcel of land lying and being in ^{the} county of Lee and on Jones Creek in the Crab-orchard containing by estimation thirty and a half acres be the more or less bounded as follows: Beginning on the lot pole line ~~20~~ poles from white oaks and beeches on the north side of a branch to a white oak S 20 E 20 poles to a red oak on the top of a ridge and with said ridge S 20 1/2 W 30 poles to a pine and chestnut on the top of a high spur N 20 1/2 W 20 poles to a little gum and chestnut N 20 W 10 poles to two chestnut oaks S 20 1/2 W 30 poles to a small wood tick-ory and two dead spanish oaks, (now gone) N 21 1/2 E 30 poles to a chestnut at the top of a deep hollow N 20 E 20 — to the beginning. To have and to hold the said tract of land ^{or parcel} with all of its appurtenances unto the party of the second part and his heirs forever. And the party of the first part covenant that the ^{marrow} will generally the title to the land hereby conveyed. And the party of the first part hereby reserve to ~~themselves~~ the vendor's lien on said land until the purchase money therefor is fully paid. Witness the following signature and seal,

John C. Stapleton (seal)

Armedia Stapleton (seal)

Virginia Lee County to wit :

I, John A. G. Hyatt com'r in ch. ^{for} do certify, that John C. Stapleton, whose name is signed to the foregoing deed dated March the 7th 1887 personally appeared before me in the said county and acknowledged said writing, to be his act and deed. Given under my hand this the 7th day of March 1887.

J. A. G. Hyatt, com'r. do.

Virginia Lee County to wit :-----I, John A. G. Hyatt commissioner in chancery for Lee County do certify, that Almida Stapleton wife of John C. Stapleton those names are signed to the foregoing deed dated March the 7th 1887 personally appeared before me in the county at ore said and being examined ^{separately} ~~privately~~ and apart from her husband and having, the deed fully explained to her she declared she willingly executed ^{signed} the same and did not wish to retract ~~the~~ the same. Given under my hand this the 20th day of August 1888

John A. G. Hyatt com. in chancery for Lee County court.

Virginia Lee County ~~1888~~ court clerk's office, Feb 7th 1888
The foregoing deed bearing date March the 7th 1887 between John C. Stapleton and Almida his wife of the first part and and W. C. Herndon of the second part all of Lee County Va. was this day filed in ^{office} ~~the clerk's office~~ and admitted to record upon the foregoing certificate of John A. G. Hyatt a commissioner in chancery for Lee County court. Test John R. Gibson, clerk.

Virginia Lee County to wit

A Copy Teste S. F. Beckman Clerk
This day R. I. Permin, son personally appeared before me a notary public in and for the county and state aforesaid and made oath that he had copied the foregoing deed from the records of the county court of said county on file in the clerk's office of the said county court and that the same is a true transcript therefrom. This Feb _____ 1884

A. C. Shindler

Franz copy of deed

John C. Stetson wife

~~~~~  
The far copy,

\$50







William T. Sherman, Major General, U.S. Army, 1861-1877  
and the following: Major General, U.S. Army, 1861-1877

(Name) (Rank) (Date)  
(Name) (Rank) (Date)

I John A. [Name] a [Rank] in [Branch] for [Rank] [Name]  
[Rank] [Name] [Rank] [Name] [Rank] [Name] [Rank] [Name]  
[Rank] [Name] [Rank] [Name] [Rank] [Name] [Rank] [Name]  
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and of not and approved to me that it was for con-  
sideration the same and for the best of the people  
of that the same is in the hands of the people  
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Bathurst Co  
N. York Chy-  
H. C. Harland et al

Copies of Deeds

10  
H. C. Hudson

From -

John C. Stoughton  
John C. Stoughton  
John B. Stoughton  
Larkin Stoughton  
Wm. Hughes  
Reuben Robinson  
M. C. Farnham

Frouce

H. C. Overdoun

10

Louis P. Farrar  
William Woodward

Free for Copies

James ~~45~~ 55



J.R.Butt, Will H. Cox, and J.P.Young partners in business under  
the firm name of Butt, Young & Co. Compts.

vs. *In Chancery*

John p., Larken and W.C. herndon, David P.Parsons, Wm. Wood-  
ward and John C. Stapleton. Defts.

Memoranda

The object of this suit is to have the deed of said W.C.  
Herndon and wife, executed on the 14th. day of March, 1893 to the  
said Parsons, conveying to the said Parsons a certain tract of  
land therein mentioned, vacated, set aside and declared for naught  
and the land therein mentioned subjected to the payment of the  
said plaintiffs debt of \$115.00, and the costs of this suit. And  
also to have the deed made by the said W.C.Herndon on the 10th.  
day of Nov., 1893 to secure to the said Woodward the payment of  
the sum of \$675.00, vacated, set aside and declared for naught.  
The land mentioned and included in the said two deeds is situated  
in the Pocket and Craborchard Country, on the waters of Redd's and  
Jones' creeks and the North Fork of Powells river, and is said to  
be some 1200 acres and is the same land which was at various times  
conveyed to the said W.C.Herndon by the heirs of Chas. Pennington,  
Larken Herndon, John B. Pennington, and Tobias P. Hughes, a part  
of which is bounded as follows, to-witt: BEGINNING at a stake  
on the North side of said river at the mouth of Reed's creek, thence  
eastwardly with the meanderings of the said river to the McCreedie  
line, thence N.38W. poles to a gum, two chestnuts and a span-  
ish oak, corner to H.A.Bayleys land, thence with his lines N.30W.  
42 poles to three white oaks, thence northwardly with Parker's line  
to ~~James Quillen's~~ Jones' creek and with said creek to Markum's  
lines and corner, thence with his lines southwardly to A.K.DeBUSKS  
corner, thence with his several lines and corners to Alfred John-  
son's land, formerly Samuel Parsons land, thence <sup>with the</sup> lines and corners  
of the said Parsons tract to the said James Quillen's land, thence  
with his lines to Mathew Zion's land, thence with his lines to



the Lawson land, thence with his lines and corners to the Beginning. And also the tract of land conveyed to the said W.C. Herndon by the said Larken Herndon, and John B. Pennington by deed dated on the 20th. day of July, 1889, and recorded in the Clerk's office of the County Court of Lee County in deed book No. 25, page 163,- it being the same tract of land conveyed by the said W.C. Herndon to the said Wm. WOODWARD on the 10th. day of Nov., 1893 and which deed is recorded in deed book No. 29 page 436, and to both of which last named deeds reference is here made for a more particular description of the said lands. The names of the persons whose estates are intended to be effected by this suit are W.C. Herndon, ~~David~~ David P. Parsons and Wm. Woodward.

*Bull, Young & Co.,  
per Pennington Bros.  
Counsel*

*Virginia Lee County to wit;  
In the office of the Clerk of the said  
County the 8th day of June 1894, this Bill of Complaint was  
presented and admitted to record  
Teste: S. N. F. Richmond Clerk*



Buck, Young & Co.,  
vs. Lisperduna  
H. C. Henderson et al  
Recorded in deed  
Book 30 page 170  
S. V. H. Richmond clerk

Filed for record  
June 8th 1894  
S. V. H. Richmond clerk



In the Clerk's Office of the Circuit Court of the County of  
*Lee* on the *1st* day of *January* 18*94*.

against

*Butt Young & Co*

Plaintiff

*In Chancery*

*W. H. Herndon et al* Defendant

The object of this suit is to *1st* is to set aside an annul the deed of *W. H. Herndon* & his wife to *David P. Parsons* dated *March the 14th 1893*; *2nd* to set aside and declare void the deed made by *W. H. Herndon* wife to *Mr. Woodward* dated *Novr 10th 1893*; *3rd* to annul the transfer of goods or chattels made by *W. H. Herndon* to *John P. Larken Herndon* on or about *Novr 10th 1893*; and *4th* that a judgment be given in favor of the Plffs against the Defendants for the amount mentioned in the bill & the same *but saving out of said property the Plffs expenses*.  
And an affidavit having been made and filed that the defendant *W. H. Herndon*

*is* not a resident of the State of Virginia, it is ordered that *he* do appear here, within *fifteen days* after due publication hereof, and do what may be necessary to protect *his* interest in this suit. And it is further ordered that a copy hereof be published once a week for four weeks in the *Lee County Republican* and that a copy be posted at the front door of the court-house of this *County* on the first day of the next term of the *County* Court.

A copy—Teste:

*Perrington Bros* p. q.

*A. B. Mursey* Clerk.



Butt Young & Co

vs.

}

ORDER OF  
PUBLICATION.

W. H. Herndon et al

I, A. B. Munsey clerk of  
the Circuit Court do Certify  
that I delivered to the Secy  
County Republican the 2<sup>nd</sup> in  
in front the 1<sup>st</sup> day of January  
1894 for Publication, and  
posted a copy thereof at the  
front door of the Court house  
at the January Term, 1894  
of the County Court.

A. B. Munsey clerk



The Commonwealth of Virginia,

To the Sheriff of the County of Lee, Greeting:

WE COMMAND YOU, That you summon

Ed Garrett

to appear before our County Court for the County of Lee at the  
court-house, on the 18 day of September 1895 to testify and the truth to say  
before the Grand Jury then to be in session.

And this he shall in no wise omit, under the penalty of £100. And have then there this writ.

WITNESS, A. M. Goins Atty for the Commonwealth  
Clerk of our said Court

the 17 day of September 1895, in the 120 year of the Commonwealth.

A M Goins, Atty for Comm.  
Clerk



Commonwealth

vs.

SUBPENA FOR  
WITNESS BEFORE  
GRAND JURY

To..... day of.....

189.....

Executed Sept  
17. 1895 E. S. Peterson  
for W. P. Miller  
S. L. C.



The Commonwealth of Virginia,

To the Sheriff of the County of Lee, Greeting:

WE COMMAND YOU, That you summon

*W. C. Shindler*  
*Larkin Shindler, John P. Shindler,*  
*Louis P. Parsons, William Woodward*  
*and John C. Stofoten*

to appear at the Clerk's Office of the Circuit Court of the County of Lee, at the rules to be held for the said Court on the *10<sup>th</sup>* Monday in *Jan* 189*4* to answer a bill in Chancery

exhibited against

*there*  
*your* in our said court by *J. R. Bath*  
*J. P. Young, W. H. Cox* partner in trade  
*under the style & firm of Bath Cox & Co*

And have then there this writ.

Witness, A. B. MUNSEY, Clerk of our said Court, at the court-house,

the *8* day of *Dec.* 189*4*, and in the *11* *8* year of the Commonwealth.

*A Copy Teste*

*A B Munsey* Clerk.

*A B Munsey clk*



The proper affidavit having been made and filed the officer executing this summons is directed to attach the following real estate of W. C. Herndon, all of which lies in Lee Co., Va., in the Craborchard consisting of two tracts, the first of which is now in the hands of David P. Parsons and bounded as follows to-wit:

Beginning at a stake on the North bank of the North Fork of Powell's river at the mouth of Reed's creek; thence eastwardly with the meanderings of the said river to the McCradia line, thence N. 38 W. --- po to a gum 2 chestnuts and a spanish oak corner to A. J. Bailey's land, and with lines of same N. 24 W. 28 po, to a White oak and Chestnut, thence N. 35 W. 42 po, to 3 White oaks, thence N. with Parker's line to Jones creek, and with said creek to Joseph Marcum's corner, thence Southwardly with said Marcum line to A. K. DeBusk's corner, thence with his several lines and corners to Alfred Johnson's land formerly Samuel Parson's land, thence with lines and corner of said Parson tract to James Quillen's land, thence with his lines and corner to Mathew Zion land, thence with his lines and corner to Lawsons land thence with his lines and corner to the beginning. The 2nd of which tracts is now in the hands of Wm. Woodard, and embraces that land described in deed of July 20th 1889 of Larkin Herndon and John B. Pennington to said W. C. Herndon and which is recorded in Deed Book No. 25-163.

*A. B. Murray Clerk*

vs.

**SUBPOENA  
IN CHANCERY.**

p. q.

To ..... Rules,  
Circuit Court.

Executed Dec., 1893 by delivering an office copy of the within subpoena in chancery and attachment to John P. Herndon, Larken Herndon, John C. Stapleton, Wm. Woodward and David P. Parsons and not executed as to W. C. Herndon also by attaching on the following real estate of W. C. Herndon described as follows:

all of which lies in Lee Co., Va., in the Craborchard consisting of two tracts, the first of which is now in the hands of David P. Parsons and bounded as follows to-wit:

Beginning at a stake on the North bank of the North Fork of Powell's river at the mouth of Reed's creek; thence eastwardly with the meanderings of the said river to the McCradia line, thence N. 38 W. --- po to a gum 2 chestnuts and a spanish oak corner to A. J. Bailey's land, and with lines of same N. 24 W. 28 po, to a White oak and Chestnut, thence N. 35 W. 42 po, to 3 White oaks, thence N. with Parker's line to Jones creek, and with said creek to Joseph Marcum's corner, thence Southwardly with said Marcum line to A. K. DeBusk's corner, thence with his several lines and corners to Alfred Johnson's land formerly Samuel Parson's land, thence with lines and corner of said Parson tract to James Quillen's land, thence with his lines and corner to Mathew Zion land, thence with his lines and corner to Lawsons land thence with his lines and corner to the beginning. The 2nd of which tracts is now in the hands of Wm. Woodard, and embraces that land described in deed of July 20th 1889 of Larkin Herndon and John B. Pennington to said W. C. Herndon and which is recorded in Deed No. 25-163.



The Commonwealth of Virginia,

To the Sheriff of the County of Lee, Greeting:

WE COMMAND YOU, That you summon

*W. C. Menden, Darius  
Smyth, John P. Menden, Louis  
P. Parsons, William Woodward, and  
John C. Stoughton*

to appear at the Clerk's Office of the Circuit Court of the County of Lee, at the rules to be held for the said  
Court on the *10<sup>th</sup>* Monday in *Jan*, 189*4*, to answer a bill in Chancery,  
exhibited against *John* in our said court by *J. R. Bath*.

*J. P. Young & W. H. Day partners in trade  
under the firm style of Bath Bros & Co*

And have then there this writ.

Witness, A. B. MUNSEY, Clerk of our said Court, at the court-house,

the *8* day of *Dec*, 189*4*, and in the 11 *8* year of  
the Commonwealth.

*A B Munsey* Clerk.



The proper affidavit having been made and filed the officer executing this summons is directed to attach the following real estate of W. C. Herndon, all of which lies in Lee Co., Va., in the Craborchard consisting of two tracts, the first of which is now in the hands of David P. Parsons and bounded as follows to-wit:

Beginning at a stake on the North bank of the North Fork of Powell's river at the mouth of Reed's creek; thence eastwardly with the meanderings of the said river to the McCradia line, thence N. 38 W. --- po to a gum 2 chestnuts and a spanish oak corner to A. J. Bailey's land, and with lines of same N. 24 W. 28 po, to a White oak and Chestnut, thence N. 35 W. 42 po, to 3 White oaks, thence N. with Parker's line to Jones creek, and with said creek to Joseph Marcum's corner, thence Southwardly with said Marcum line to A. K. DeBusk's corner, thence with his several lines and corners to Alfred Johnson's land formerly Samuel Parson's land, thence with lines and corner of said Parson tract to James Quillen's land, thence with his lines and corner to Mathew Zion land, thence with his lines and corner to Lawsons land thence with his lines and corner to the beginning. The 2nd of which tracts is now in the hands of Wm. Woodard, and embraces that land described in deed of July 20th 1889 of Larkin Herndon and John B. Pennington to said W. C. Herndon and which is recorded in Deed Book No. 25.-163.

*A B Murrey clerk*

*Butt boxes*

US.

SUBPENA  
IN CHANCERY.

*W. C. Herndon et al*

*Pennington Prop. q.*

To *1st January* 1894 Rules,

Circuit Court.

Executed Dec., 1893 by delivering an office copy of the within subpoena in chancery and attachment to John P. Herndon, Larkin Herndon, John C. Stapleton, Wm. Woodward and David P. Parsons and not executed as to W. C. Herndon also by attaching on the following real estate of W. C. Herndon described as follows:

Beginning at a stake on the North bank of the North Fork of Powell's river at the mouth of Reed's creek; thence eastwardly with the meanderings of the said river to the McCradia line, thence N. 38 W. --- po to a gum 2 chestnuts and a spanish oak corner to A. J. Baileys land, and with lines of same N. 24 W. 28 po, to a White oak and Chestnut, thence N. 35 W. 42 po, to 3 White oaks thence N. with Parker's line to Jones creek, and with said creek to Joseph Marcum's corner, thence Southwardly with said Marcum line to A. K. DeBusk's corner, thence with his several lines and corners to Alfred Johnson's land formerly Samuel Parson's land, thence with lines and corner of said Parson tract to James Quillen's land, thence with his lines and corner to Mathew Zion land, thence with his lines and corner to Lawsons land thence with his lines and corner to the beginning. The 2nd of which tracts is now in the hands of Wm. Woodard, and embraces that land described in deed of July 20th 1889 of Larkin Herndon and John B. Pennington to said W. C. Herndon and which is recorded in Deed Book No. 25.-163.

*W. C. Herndon, J. C. Stapleton, Wm. Woodward, David P. Parsons*



W. C. Herndon et al Defs

The object of this suit of to 1st is to set aside and annul the deed of W. C. Herndon and his wife to David P. Parsons dated March the 14th 1893; 2nd to set aside and declare void the deed made by W. C. Herndon and wife to Wm Woodward dated Nov 10th 1893; 3rd to annul the transfer of goods and chattles made by W. C. Herndon to John P. and Larkin Herndon on or about Nov. 10th 1893; and 4th that a judgment be given in favor of the plffs against the defendant for the amount mentioned in the bill and the same be satisfied out of said property thereby conveyed.

And an affidavit having been made and filed that the defendant W. C. Herndon is not a resident of the State of Virginia, it is ordered that he do appear here within fifteen days after due publication hereof, and do what may be necessary to protect his interest in this suit.

And it is further ordered that a copy hereof be published once a week for four weeks in the Lee County Republican and that a copy be posted at the front door of the court house of this county on the first day of the next term of the county court.

A copy—Teste:

A. B. Munsy Clerk.

Pennington Bros. p q

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I W. P. Dryden & Sons pub

isher of the LEE COUNTY REPUBLICAN a weekly newspaper, published in the town of Jonesville, county of Lee, and State of Virginia, do hereby certify that the foregoing Order of Publication was duly published in the above named paper for four successive weeks, ending the

1st day of Feb 1894.

pr Sam L. Dryden

Publisher, LEE COUNTY REPUBLICAN